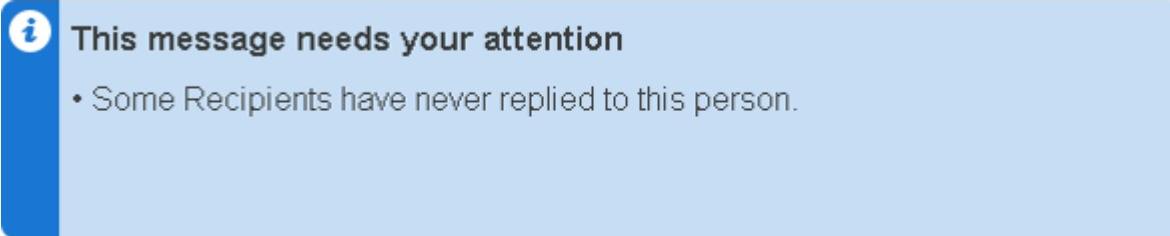


# **EXHIBIT 4**

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**From:** McGuinness, Mike <Mike.McGuinness@wilmerhale.com>  
**Sent:** Thursday, August 14, 2025 2:43 PM  
**To:** Daniel Mummolo; Luckey McDowell; Ian Roberts; Jacob Fields; Samuel Cooper; Cleary, Blake; jnoa@potteranderson.com; Risener, James R.; Anker, Phil; Firsenabaum, Ross; Feinzig, Josh M.; Weitzman, Samuel E.; Laura Davis Jones; Peter J. Keane; Ericka Johnson; Steven D. Adler; Lauren Warner; Scott R. Grubman; Brittany Cambre; Morgan Patterson; marcy.smith@wbd-us.com; Amanda Clark-Palmer  
**Cc:** Mario Gazzola; William F. Taylor; Lehman, Bradley P.; QE-Lucky Bucks  
**Subject:** RE: Proposed 502(d) Stipulation  
**Attachments:** 2025.08.14 Rule 502(d) Stipulation (WH DRAFT)(210850292.11).docx; Redline - WH v. QE Rule 502(d) Stipulation Draft.pdf

[EXTERNAL EMAIL from [mike.mcguinness@wilmerhale.com](mailto:mike.mcguinness@wilmerhale.com)]



Danny,

Please see attached a revised draft of the Rule 502(d) stipulation, along with a redline against your draft. After receiving your draft stipulation, Defendants were of the view that your draft was more complicated than it needed to be. We have coordinated with counsel for the other Defendants to prepare the attached, simplified version of the stipulation, which we understand is acceptable to all Defendants. Please let us know if the attached is also acceptable to the Trustee.

Regards,  
Mike

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**From:** Daniel Mummolo <danielmummolo@quinnmanuel.com>  
**Sent:** Friday, July 18, 2025 4:08 PM  
**To:** Luckey McDowell <lucky.mcdowell@aoshearman.com>; Ian Roberts <ian.roberts@aoshearman.com>; Jacob Fields <jacob.fields@aoshearman.com>; Samuel Cooper <samuel.cooper@aoshearman.com>; Cleary, Blake <bcleary@potteranderson.com>; jnoa@potteranderson.com; Risener, James R. <jrisener@potteranderson.com>; Anker, Phil <Philip.Anker@wilmerhale.com>; Firsenabaum, Ross <Ross.Firsenabaum@wilmerhale.com>; McGuinness, Mike <Mike.McGuinness@wilmerhale.com>; Feinzig, Josh M. <Josh.Feinzig@wilmerhale.com>; Weitzman, Samuel E. <Samuel.Weitzman@wilmerhale.com>; Laura Davis Jones <ljones@pszjlaw.com>; Peter J. Keane <pkeane@pszjlaw.com>; Ericka Johnson <ejohnson@bayardlaw.com>; Steven D. Adler <sadler@bayardlaw.com>; Lauren Warner <lwarner@cglawfirm.com>; Scott R. Grubman <sgrubman@cglawfirm.com>; Brittany Cambre <bcambre@cglawfirm.com>; Morgan Patterson <morgan.patterson@wbd-us.com>; marcy.smith@wbd-us.com; Amanda Clark-Palmer <aclark@gsllaw.com>  
**Cc:** Mario Gazzola <mariogazzola@quinnmanuel.com>; William F. Taylor <wtaylor@whitefordlaw.com>; Lehman,

Bradley P. <[blehman@whitefordlaw.com](mailto:blehman@whitefordlaw.com)>; QE-Lucky Bucks <[qe-luckybucks@quinnmanuel.com](mailto:qe-luckybucks@quinnmanuel.com)>

**Subject:** Proposed 502(d) Stipulation

**EXTERNAL SENDER**

Counsel:

Trive and the management defendants have served discovery requests on the Trustee seeking documents that Shearman & Sterling previously produced in its capacity as former corporate counsel to the Debtor in connection with the note purchases and distributions. In light of the fact that all defendants are former insiders of the Debtor, to facilitate production without waiving any applicable privilege, we propose proceeding under a Rule 502(d) stipulation.

Attached are (i) a stipulation under Rule 502(d); (ii) a proposed order; and (iii) a certification of counsel. All parties would execute the stipulation, which we would then file with the Court, before we produce any documents.

Please let us know your thoughts.

Thanks,  
Danny

**Daniel Mummolo**

*Associate*

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